

# Report Phase Consultation Responses



## P399 'Making the identity of balancing service providers visible in the Balancing Services Adjustment Data'

This Report Phase Consultation was issued on 15 October 2020, with responses invited by 16 November 2020.

### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

### Consultation Respondents

Respondent	Role(s) Represented
Centrica Plc (British Gas Trading Ltd)	Generator, Supplier
Limejump Ltd	Supplier
National Grid ESO (NGESO)	System Operator
Scottish Power Energy Management Ltd.	Generator, Supplier, Non Physical Trader, ECVNA, MVRNA

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P399  
Report Phase Consultation  
Responses

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18 November 2020

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Version 1.0

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Page 1 of 10

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P399 should be approved?

**Summary**

Yes	No	Neutral/No Comment	Other
2	0	0	1

**Responses**

Respondent	Response	Rationale
Centrica	Other	<p>We support the objective of transparency, but not the costs of delivering P399 in its current form.</p> <p>Overall, we do not support the proposal on the grounds that equivalent benefits could have been delivered at lower cost by making the data more accessible via another route – such as Option 2 in the NETSO's revised Impact Assessment. We set out in our response to Question 7 how we believe transparency can be delivered at a significantly reduced cost.</p> <p>(a) Neutral – whilst not disagreeing with the Workgroup's views on objective (a) around transparency and competition for all. This information can largely be derived from existing sources and an alternative less costly solution could have been found to making this data more accessible to all balancing service providers.</p> <p>(b) Positive – we agree that making this information more accessible has the benefits cited by the Workgroup. We believe transparency improvements could have been delivered at less cost.</p> <p>(c) Positive – we support measures that improve competition. We don't agree that there was a material information imbalance because the information is deducible from other data items that are already published to the industry. We believe a more cost-effective method could have been found to making the data more accessible to all market participants.</p> <p>(d) Neutral – we do not believe this is an efficient way of implementing a solution to the issue due to the costs involved</p> <p>(e) Positive – agree that it is consistent with the EBGL objectives of ensuring transparency and fostering effective competition</p>

Respondent	Response	Rationale
Limejump	Yes	Yes, we are supportive as it will promote competition in accordance with the BSC objectives by providing details of all parties providing balancing services outside of the BM.
NGESO	Yes	-
Scottish Power	Yes	-

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P399?

### Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

### Responses

Respondent	Response	Rationale
Centrica	Yes	-
Limejump	Yes	Yes, we agree with the additional data included in the redlined changes – Party ID, Asset ID, Service Type and Tendered Status.
NGESO	Yes	-
Scottish Power	Yes	We are comfortable that the legal text provided delivers the intent of the modification although we have not conducted a full legal review.

## Question 3: Do you agree with the Panel's recommended Implementation Date?

### Summary

Yes	No	Neutral/No Comment	Other
2	1	0	0

### Responses

Respondent	Response	Rationale
Centrica	Yes	We are not disagreeing with the Implementation Date if the rest of the Panel's recommendations regarding this mod are approved - but note our comments to Q1 and Q7.
Limejump	Yes	Yes, we agree that if an OFGEM decision is made by 13/1/21 that the implementation will be by 24/6/21. We would welcome a decision by OFGEM to meet this deadline.
NGESO	No	NGESO IS resources are being prioritised for Clean Energy Package changes which will run until March 21. The impact of this means that NGESO will not be able to implement the changes of P399 in June 2021 and will now need to use the implementation date of November 2021 as discussed in the Workgroup.
Scottish Power	Yes	The implementation dates proposed appear reasonable and should provide adequate lead time for industry to make any necessary system changes

Question 4: Do you agree with the Panel's initial consideration that P399 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Yes	No	Neutral/No Comment	Other
3	0	0	0

## Responses

Respondent	Response	Rationale
Centrica	Yes	-
Limejump	Yes	We support the view of the WG that the modification proposal will help effective competition by providing additional transparency.
NGESO	Yes	-
Scottish Power	Yes	Since the subject matter of the modification relates to market sensitive information and the provision of balancing services it does impact EBGL and the relevant conditions within the BSC

Question 5: Do you agree with the Panel's initial view that P399 should not be treated as a Self-Governance Modification?

## Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

## Responses

Respondent	Response	Rationale
Centrica	Yes	-
Limejump	Yes	Agree with the Panel
NGESO	Yes	-
Scottish Power	Yes	The modification impacts EBGL and competition so it should not be treated as a self-governance modification

Question 6: Do you have any comments on the impact of P399 on the EBGL objectives?

## Summary

Yes	No	Neutral/No Comment	Other
1	2	0	0

## Responses

Respondent	Response	Rationale
Centrica	No	-
Limejump	Yes	We welcome this proposal to improve competition for those offering Balancing Services.
NGESO	No	-
Scottish Power	No	It increases transparency and so should contribute to fostering effective competition

## Question 7: Do you have any further comments on P399?

### Summary

Yes	No
3	0

### Responses

Respondent	Response	Rationale
Centrica	Yes	<p>As set out in our response to Question 1, we are supportive of increasing transparency for all market participants, but not the costs of delivering the Working Group's recommendation. This does not represent value for money and the Report Phase Consultation documents shows that the Workgroup struggled with the balance of high costs v benefits.</p> <p>We would suggest an alternative to be considered of no change to flows to Elexon/BMRS and changes just on NETSO side:</p> <p>a) Amend the existing NETSO Data Portal Ancillary Service Dispatch Platform (ASDP) information report (<a href="https://data.nationalgrideso.com/ancillary-services/non-bm-ancillary-service-dispatch-platform-asdp-instructions">https://data.nationalgrideso.com/ancillary-services/non-bm-ancillary-service-dispatch-platform-asdp-instructions</a>) to include the name of counterparty, and</p> <p>b) Either update the NETSO Trade Reporting system to include the Counterparty in an existing report or create a new NETSO Data Portal report to contain all the required information.</p> <p>The NETSO's revised Impact Assessment included an estimated cost of £452K for Option 2 – essential items on NETSO Data Portal. This seems high to us. We suggest that this £452K cost is revisited, to see if the abovementioned changes could be delivered at a lower cost.</p>
Limejump	Yes	<p>We note that the WG has sought feedback on the cost increase of between c£100k-£500k to add the 'tendered status' field. The total original costs were £750k. We believe that this field should be included even with the additional cost as it is an important part of the disclosure. It will allow market participants to understand the level of non-tendered services which arise from either Mandatory Services as part of connection agreements or bilateral contracts.</p>

Respondent	Response	Rationale
NGESO	Yes	<p>Following on from further IS work, part of P399's scope was to include a "tendered status". This was due to be done through work relating to the Clean Energy Package Article 6(9). This has now been descoped from that element meaning that P399 would need to be the driver for this part of the change. This will result in an increased implementation cost of £350k-£500k, with an overall cost of £850k-£1m to implement P399. This is still considerably less than the original impact assessment of £2-2.3m. Additionally, this increased scope for P399 means that the earliest the change can be delivered is November-21. We recognise that this is later than originally discussed at the Workgroup and we will endeavour to be transparent as we move through the development process.</p> <p>NGESO would also like to address the question raised on REMIT obligations on publishing interconnector trades, we see this as out of scope of P399, however, we will be looking into what further information we could publish in relation to interconnector trades as part of our ongoing data transparency work.</p> <p>Finally, our internal trading team have had no objections from interconnectors in publishing their name, the only thing they want to make sure happens is that it's clear we aren't trading with them, we are trading with a counterparty who are using them to deliver the energy. This will be done by only including information about them in the Service ID section not the party ID section.</p>
Scottish Power	No	-